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Attorneys for Defendants

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

Isabel Solorzano and
Ronaldo Yersay Palacos Cardona,

Plaintiffs,

v.

DONNA P. CAMPAGNOLO, Director,
California Service Center, U.S. Citizenship
and Immigration Services, in her official
capacity as well as her successors and assigns;

ALEJANDRO MAYORKAS, Secretary,
Department of Homeland Security, in his
official capacity as well as his successors and
assigns;

UR MENDOZA JADDOU, Director, U.S.
Citizenship and Immigration Services, in her
official capacity as well as her successor and
assigns;

ANTONY BLINKEN, Secretary of State, in
his official capacity as well as his successor
and assigns;

PHILLIP SLATTERY, Director, National
Visa Center, U.S. Department of State, in his
official capacity as well as his successors and
assigns; and

RICHARD C. VISEK, Acting Legal
Advisor, U.S. Department of State, in his
official capacity as well as his successors and
assigns,

Defendants.

Case No. 2:24-cv-00240-GMN-DJA

**Stipulation and Order for Extension of
Time to Respond to Plaintiffs'
Complaint (First Request)**

1 Plaintiffs and Defendants, through their undersigned counsel, stipulate and request
2 that the Court approve a 60-day extension of time, from April 15, 2024, to June 15, 2024,
3 for Defendants to respond to Plaintiffs' Complaint, ECF. No. 1. This is the parties' first
4 request for an extension of time.

5 Federal Rule of Civil Procedure 6(b)(1)(A) and Local Rule IA 6-1 allow a party to
6 request additional time to perform an act. The subject of this litigation concerns Plaintiffs' I-
7 129F Petition for Alien Fiancée ("First Petition"). On or about December 28, 2020, Plaintiffs
8 submitted to Defendants' U.S. Citizen and Immigration Services ("USCIS") their First
9 Petition, which was approved by USCIS and then forwarded to National Visa Center
10 ("NVC") and the United States Consulate ("Consulate") for processing. The First Petition
11 was subsequently cancelled, and Plaintiffs were informed that a new I-129F Petition (Second
12 Petition) should be submitted. USCIS approved Plaintiffs' Second Petition on or about
13 March 13, 2024, and Plaintiffs are now awaiting processing of the Second Petition by the
14 NVC and Consulate. Pending the remaining administrative processing of the Second
15 Petition this litigation may become moot.

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1 Based on these circumstances, the parties request an additional 60-day extension of
2 time, from April 15, 2024, to June 15, 2024, for Defendants to file a response to Plaintiffs'
3 Complaint, ECF. No. 1. This stipulated request is filed in good faith and not for the purposes
4 of undue delay.

5 Respectfully submitted this 25th day of March 2024.

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7 DATED: March 25, 2024

8 QUIROGA LAW OFFICE, PLLC

9
10 /s/ Maria E. Quiroga
11 MARIA E. QUIROGA

DATED: March 25, 2024

JASON M. FRIERSON
United States Attorney

12 /s/ Ann Wilkinson
13 ANN WILKINSON
14 Assistant United States Attorney

15 **IT IS SO ORDERED:**

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17 DANIEL J. ALBREGTS
18 **UNITED STATES MAGISTRATE JUDGE**

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DATED: 3/26/2024

Certificate of Service

I, Danielle Bleecker, Paralegal Specialist, hereby certifies that on March 25, 2024 I electronically filed and served the foregoing **STIPULATION AND ORDER FOR EXTENSION OF TIME TO RESPOND TO PLAINTIFFS' COMPLAINT (First Request)** with the Clerk for the United States District Court for the District of Nevada using the CM/ECF system; and served the same using the Court's CM/ECF system to:

Maria E. Quiroga, Esq.
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Maria.QuirogaLawOffice.com
Attorney for Plaintiffs

Dated this 25th day of March 2024.

/s/ Danielle Bleecker
DANIELLE BLEECKER